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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PHILLIP RACIES, On Behalf of Himself
and All Others Similarly Situated,) Case No. 4:15-cv-00292-HSG

Plaintiff,)

vs.)

QUINCY BIOSCIENCE, LLC, a)
Wisconsin limited liability company,)

Defendant.)

STIPULATION REGARDING
VOLUNTARY DISMISSAL OF
PLAINTIFF'S INDIVIDUAL CLAIMS
WITHOUT PREJUDICE

Judge: Hon. Haywood S. Gilliam, Jr.
Complaint Filed: January 21, 2015
Am. Complaint Filed: February 20, 2015
Trial Date: January 6, 2020

1 Plaintiff, Phillip Racies, and Defendant, Quincy Bioscience, LLC, by and through their
2 undersigned counsel and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil
3 Procedure, hereby stipulate to Plaintiff's dismissal of his individual claims without prejudice.
4

5 Dated: May 28, 2020

Respectfully Submitted,

6
7 BONNETT, FAIRBOURN, FRIEDMAN
& BALINT, P.C.

8 By: /s/ Patricia N. Syverson
9 PATRICIA N. SYVERSON (203111)
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15 *Attorneys for Plaintiff Phillip Racies*

16 Dated: May 28, 2020

Respectfully submitted,

17 CALL & JENSEN
18 A Professional Corporation
19 Matthew R. Orr
William P. Cole
Joshua G. Simon

20 By: /s/ Matthew R. Orr
21 Matthew R. Orr

22 and

23 Geoffrey W. Castello [*Admitted Pro Hac Vice*]
Glenn T. Graham [*Admitted Pro Hac Vice*]
24 Kelley Drye & Warren LLP

25 *Attorneys for Defendant Quincy Bioscience, LLC*

SIGNATURE CERTIFICATION

Pursuant to Rule 5-1(i)(3) of the United States District Court for the Northern District of California Local Rules, I hereby certify that the content of this document is acceptable to Matthew R. Orr, counsel for Defendant, and that I have obtained his authorization to affix his electronic signature to this document.

Dated: May 28, 2020

BONNETT, FAIRBOURN, FRIEDMAN &
BALINT, P.C.

By: /s/ Patricia N. Syverson

Patricia N. Syverson
Attorneys for Plaintiff

1
2 **CERTIFICATE OF SERVICE**
3

4 I hereby certify that on May 28, 2020, I electronically filed the foregoing document described
5 as **STIPULATION AND [PROPOSED] ORDER REGARDING VOLUNTARY DISMISSAL**
6 **OF PLAINTIFF'S INDIVIDUAL CLAIMS WITHOUT PREJUDICE** with the Clerk of the
7 Court using the CM/ECF System, which will send notification of such filing via electronic mail to
8 all counsel of record.

9 _____
10 /s/ *Patricia N. Syverson* _____
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